

Middle Peninsula Aquaculture
P.O. Box 769
North, Virginia 23128
April 19, 1999

Docket No. 98P-0504
Docket Management Group (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

9005 '99 APR 20 P2:15

Dear Sir:

I am writing in response to the request for comments on a performance standard for Vibrio vulnificus. I feel that a performance standard on non-detectable limits of Vibrio vulnificus or parahaemolyticus is unwarranted, unnecessary and cost prohibitive. The AmeriPure Company technology costs \$250,000 to license and about \$800,000 for equipment. This will put small family seafood operations out of business. There is limited demand for treated shellfish and it is far more expensive than raw shellfish.

Research is required by the FDA to identify the pathogenic strains of these bacteria and to set reasonable levels of detection since both bacteria are commonplace in the environment.

Sincerely,



Kenneth Kurkowski
President

98P-0504

c96

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